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March 7, 2025

**BY ECF**

Hon. Justin T. Quinn  
United States District Court  
District of New Jersey  
Clarkson S. Fisher Building & U.S. Courthouse  
402 East State Street  
Trenton, NJ 08608

Re: *Doe v. Rutgers, Civ. No. 23-22385 (ZNQ)(DEA)*

Dear Magistrate Judge Quinn:

This firm and Offit Kurman, P.A., represent Plaintiff in the above-referenced action. We write on behalf of both parties to provide a joint status update pursuant to Paragraph 20 of the Pretrial Scheduling Order entered on December 27, 2024. (ECF 45, “Scheduling Order”).

The parties worked together in good faith to draft and finalize a Discovery Confidentiality Order which was entered on the docket on February 13, 2025. (ECF 48). The parties also agreed to a Stipulated Discovery Protocol regarding the production of documents.

The parties have each served their initial discovery demands in accordance with the Scheduling Order, as well as their written responses and objections to those demands. At this time, the parties have not identified any issues in the responses and objections to the initial discovery demands that would require Court intervention. Rutgers made an initial document production in response to Plaintiff’s initial demands on Monday, March 3, 2025 and a smaller supplemental production on March 4, 2025. Plaintiff made an initial document production on Thursday, March 6, 2025. The parties will continue to produce documents on a rolling basis utilizing, where applicable, agreed-upon search terms and connectors to identify potentially relevant electronically stored information in their possession, custody, and control. Should any discovery issues arise during or following the complete exchange of documents related to these demands or otherwise, the parties will promptly advise the Court in accordance with applicable rules and this Court’s Civil Case Management Order.

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In accordance with the Stipulated Discovery Protocol, the parties have met and conferred regarding the terms and connectors to be used to search their electronically stored information for potentially relevant documents. There is an agreement on the terms and connectors that Plaintiff will apply to his electronically stored information. The parties are still discussing the terms and connectors to be used by Defendant Rutgers and hope to come to an agreement on this issue shortly. The parties have agreed to undertake reasonable efforts to identify discovery material in their custody, control, and possession that may be located without the need to employ specific search terms.

Finally, the parties remain open to discussing settlement of this matter. However, at this time, the parties have not had the opportunity to exchange and review all relevant documents and communications, and continue to believe that additional fact discovery is necessary for a settlement conference to be a useful exercise. The parties will continue to diligently conduct discovery and agree to revisit the issue of settlement at appropriate intervals throughout the course of discovery.

We thank the Court for its attention to this matter.

Respectfully,

*/s/ Grant R. Cornehls*  
Grant R. Cornehls

cc: Amy L. Piccola, Esq. (via ECF)  
Levi R. Schy, Esq. (via ECF)  
James A. Keller, Esq. (via ECF)